

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 13-10200-GAO
	)	
DZHOKHAR TSARNAEV	)	

**DEFENDANT’S ASSENTED-TO MOTION FOR A PROTECTIVE ORDER**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully submits this Assented-to Motion for a Protective Order and states as follows:

In August 2013, the defense assented to the government’s motion for a protective order and the parties agreed to a protective order which governs the conduct of defense counsel with regard to discovery produced by the government. [DE 91]. The defense now seeks similar protections for the materials it must produce to the government under Rule 16, and the Court’s Orders.

**Conclusion**

Wherefore, the defense respectfully requests that the Court grant this assented-to motion and enter the attached protective order.

Respectfully submitted,

DZHOKHAR TSARNAEV  
by his attorneys

/s/ Judy Clarke

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**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 24, 2014.

*/s/ Judy Clarke*